

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

DEUTSCHE BANK TRUST COMPANY)	Civil Action No. 11-CV-00358
AMERICAS, in its capacity as successor)	
Indenture trustee for certain series of)	JUDGE BECKWITH
Senior Notes, et al.,)	MAGISTRATE JUDGE BOWMAN
)	
Plaintiffs,)	
)	
v.)	
)	
AMERICAN ELECTRIC POWER, et al.,)	
)	
Defendants.)	

**MOTION FOR AN EXTENSION OF TIME UP TO AND INCLUDING DECEMBER
30, 2011 FOR DEFENDANT MICHAEL E. BEE, INDIVIDUALLY AND AS TRUSTEE
FBO MICHAEL E. BEE TRUST UAD 10/20/2003 TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Michael E. Bee, Individually and as Trustee FBO Michael E. Bee UAD 10/20/2003 moves this Court to extend the time within which Defendant Michael E. Bee, individually and as Trustee may answer or otherwise respond to Plaintiff's Complaint, beyond the period provided under Local Rule 6.1(a) until December 30, 2011, subject to any stay of proceedings that may otherwise be ordered by the Court. Pursuant to Local Rule 7.3(a) and 7.4, Counsel for Defendant Michael E. Bee, Individually and as Trustee attempted to contact Plaintiff's counsel via telephone but was unable to obtain agreed consent to this extension as Counsel for Defendant Michael E. Bee, Individually and as Trustee did not receive return communication. The basis of this Motion is set forth as other pleadings have been filed and orders have been rendered in this matter seeking leave to respond to the First Amended Complaint. As such, Defendant Michael E. Bee Individually and as Trustee respectfully moves this Court to grant the requested extension to answer or otherwise plead through December 30, 2011 or such other time as the Court may instruct.

Respectfully submitted,

/s/ John Swansinger

John Swansinger (0041503)
THE SWANSINGER LAW FIRM
#1303 Fifth Third Center
600 Superior Avenue, East, Suite 1300
Cleveland, Ohio 44114
440-471-7474 Telephone
216-916-4936 Facsimile
john@swansingerlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been filed electronically with the U.S. District Court and has been sent electronically this 29th day of September, 2011. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ John Swansinger

John Swansinger (0041503)
THE SWANSINGER LAW FIRM